

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)

UNITED STATES OF AMERICA, *et al.*,

*Plaintiffs,*

v.

GOOGLE LLC,

*Defendant.*

Case No. 1:23-cv-00108-LMB-JFA

**[PROPOSED] ORDER GRANTING RELIEF REQUESTED IN RESPONSE OF  
NON-PARTY VOX MEDIA, LLC TO PENDING MOTIONS TO CONTINUE  
SEALING CONFIDENTIAL DOCUMENTS PREVIOUSLY FILED UNDER SEAL**

Before the Court are multiple motions to seal (ECF Nos. 592, 605, 612, 642, 648, 651, 661, 667, 698, 712, 715, and 719, the “Seal Motions”) and the Response by non-party Vox Media, LLC (“Vox Media”) requesting that the Court Continue Sealing Confidential Documents Previously Filed Under Seal. The confidential documents, ECF Nos. 573; 576; 579; 581-1; 581-2; 581-4; 581-5; 582-8; 640; 660; 660-5; 669; and 670-23, that are the subject of the Response (the “Sealed Pleadings”) collectively contain highly confidential internal strategy information that would be of significant value to Vox Media’s competitors and would enable such competitors to gain insight into Vox Media’s internal business operations and outlook. To date, the Sealed Pleadings have all been filed under seal and protected from public disclosure. Public disclosure of the Sealed Pleadings could potentially place Vox Media at a disadvantage with respect to its existing and potential competitors and customers if they were to gain access to its internal strategic business decisions and competitive outlook. The Court therefore finds that it is appropriate to enter an order sealing the Sealed Pleadings.

In the Fourth Circuit, “before a district court may seal any court documents, ... it must (1) provide public notice of the request to seal and allow interested parties a reasonable opportunity to object, (2) consider less drastic alternatives to sealing the documents, and (3) provide specific reasons and factual findings supporting its decision to seal the documents and for rejecting the alternatives.” *Ashcraft v. Conoco, Inc.*, 218 F.3d 288, 302 (4th Cir. 2000).

The Court finds that: (i) sufficient notice to seal was given in the Seal Motions and Vox Media has properly filed its Response to Continue Sealing Confidential Documents Previously Filed Under Seal (ECF No. \_\_\_\_); (ii) the Sealed Pleadings contain Vox Media’s confidential and proprietary business information; (iii) only sealing will protect Vox Media from competitive harm; (iv) there are no less drastic alternatives to sealing; and (v) the public’s right of access, whether based on the common law right of access, or the First Amendment right of access, has been overcome. For the foregoing reasons, and pursuant to Local Civil Rule 5 and for good cause shown, it is hereby

ORDERED that the relief requested in Vox Media’s Response is GRANTED; and it is

IT IS FURTHER ORDERED that: Doc. Nos. 573; 576; 579; 581-1; 581-2; 581-4; 581-5; 582-8; 640; 660; 660-5; 669; and 670-23 shall remain permanently under seal.

Dated: \_\_\_\_\_, 2024

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Leonie M. Brinkema  
United States District Judge